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CLERK U.S. DISTRICT COURT
DISTRICT OF ARIZONA

TIMOTHY COURCHAIINE
United States Attorney
District of Arizona
JULIE A. SOTTOSANTI
Assistant U.S. Attorneys
United States Courthouse
405 W. Congress Street, Suite 4800
Tucson, Arizona 85701
Telephone: 520-620-7300
Email: julie.sottosanti@usdoj.gov
Attorneys for Plaintiff

CR25-02182 TUC-AMM(LCK)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Cassandra Lynn Matthews, -001
(Counts 1-6)
Michael Justin Wood, -002
(Counts 1-3)

Defendants.

INDICTMENT

VIO: 18 U.S.C. §§ 933(a)(3) and (b)
(Trafficking in Firearms)
Count 1

18 U.S.C. § 554(a) and 2
(Smuggle Goods from
the United States, Aiding and
Abetting)
Count 2

18 U.S.C. § 924(k)(2)(B)
(Conspiracy to Smuggle Firearms
Out of the United States)
Count 3

18 U.S.C. §§ 922(a)(6) and
924(a)(2)
(Making a False Statement in
Connection with Acquisition of a
Firearm)
Counts 4-6

THE GRAND JURY CHARGES:

COUNT 1

On or about a date unknown through January 21, 2025, in the District of Arizona, defendants CASSANDRA LYNN MATTHEWS and MICHAEL JUSTIN WOOD did receive, attempt to receive, and conspire to receive from another person, in or otherwise

1 affecting interstate or foreign commerce, firearms as listed in Counts 4-6 of the Indictment,
2 knowing or having reasonable cause to believe that such receipt would constitute a felony,
3 to wit: 18 U.S.C. § 554(a), 18 U.S.C. § 924(k)(2), and Ariz. Rev. Stat. § 13-3102.

4 All in violation of Title 18, United States Code, Sections 933(a)(3) and (b).

5 **COUNT 2**

6 On or about a date unknown through January 21, 2025, in the District of Arizona,
7 defendants CASSANDRA LYNN MATTHEWS and MICHAEL JUSTIN WOOD
8 knowingly and fraudulently exported and sent from the United States, and attempted to
9 export and send from the United States, any merchandise, article, or object contrary to any
10 law or regulation of the United States, and received, concealed, bought, sold, and in any
11 manner facilitated the transportation, concealment, and sale of such merchandise, article or
12 object, that is: firearms, as listed in Counts 4-6 of the Indictment, knowing the same to be
13 intended for exportation contrary to any law or regulation of the United States, to wit: Title
14 50, United States Code, Section 4819, and Title 15, Code of Federal Regulations, Parts
15 736.2, 738, and 774.

16 In violation of Title 18, United States Code, Sections 554(a) and 2.

17 **COUNT 3**

18 On or about a date unknown through January 21, 2025, in the District of Arizona,
19 defendants CASSANDRA LYNN MATTHEWS and MICHAEL JUSTIN WOOD did
20 knowingly conspire to smuggle or take out of the United States firearms, as listed in Counts
21 4-6 of the Indictment, with intent to engage in or to promote conduct that would constitute
22 a felony, to wit: Title 18, United States Code, Sections 554(a) and 2, Smuggling of Goods
23 from the United States, aiding and abetting.

24 In violation of Title 18, United States Code, Section 924(k)(2)(B).

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COUNTS 4-6

On or about the dates listed below, in the District of Arizona, the defendant, CASSANDRA LYNN WOOD, in connection with the acquisition of firearms, knowingly made false statements and representations to the businesses listed below, which were intended and likely to deceive the business as to a fact material to the lawfulness of a sale of a firearm by the business, each of which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of each business listed below, in that the defendant, in connection with the purchase of each of the firearms listed below, stated that she was the actual transferee/buyer of the firearm, whereas in truth and fact, she was not the actual transferee/buyer of the firearm and she was knowingly acquiring the firearm on behalf of another individual:

Count	Date	FFL	Firearms
4	12/2/23	Turner's Outdoorsman	Ruger model max-9 9x19 caliber pistol
			Smith and Wesson model M & P Shield 9x19 caliber pistol
			Smith and Wesson model M & P 15-22, .22 caliber rifle
			Juggernaut Tactical model JT-15, receiver
			Anderson Manufacturing, model AM-15, 5.56 caliber rifle
			Taurus, model PT111 G2A, 9x19 caliber pistol
			Walther, model P22, .22 caliber pistol
			Franklin Arms, model BOSS-25, 12-gauge shotgun

1			SCCY, model CPX-1, 9x19 caliber pistol
2		Sportsman's	
3	5	1/30/24 Warehouse	SCCY, model CPX-2, 9x19 caliber pistol
4		Diamondback	Taurus, model G2S, 9x19 caliber pistol
5	6	3/11/24 Shooting Sports	

6 In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

7
8 A TRUE BILL

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10 / s /
11 FOREPERSON OF THE GRAND JURY
12 Date: May 7, 2025

13
14 REDACTED FOR
15 PUBLIC DISCLOSURE

14 TIMOTHY COURCHAINED
15 United States Attorney
16 District of Arizona

17 / s /
18 JULIE A. SOTTOSANTI
19 Assistant U.S. Attorney
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